## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

## BLACKSTONE GAS COMPANY D.T.E. 01-50

## ATTORNEY GENERAL'S FOURTH SET OF DOCUMENT AND INFORMATION REQUESTS

The following is the Attorney General's FOURTH SET of Information Requests in the above referenced docket.

AG-4-1 Please provide copies of all of the Company's current tariffs, including all terms and conditions. AG-4-2 Please provide a red-lined version of the Company's tariffs incorporating all proposed changes. AG-4-3 Please redo the Company's fully allocated cost of service study to exclude all gas and related costs that the Company proposes to recover through the CGA or other adjustment clause mechanism. Include all associated workpapers, calculations and supporting adjustments, along with a narrative explaining the specific adjustments that were made to eliminate the gas and related costs. Provide as part of the response a diskette containing the cost of service worksheets and supporting calculations as Excel files with cell formulae in tact. AG-4-4 Please provide all supporting workpapers, calculations, assumptions and supporting data related to the development of the external allocators identified in the cost of service study, Exhibit 2, Schedule 5.

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Please identify the data included in the development of each of the internal allocators

Company's Exhibits. Include all supporting worksheets and cell formulae. Please note

Please provide a diskette containing all the Excel worksheets supporting the

AG-4-5

AG-4-6

these data appear to be downloadable from the DTE website, however many of the formulae contain cell references that do not function when downloaded.

- AG-4-7 Refer to Exhibit 10, M.D.T.E. NO. 72, page 2 of 3. Please provide all supporting material, data, calculations and assumptions supporting the Company's use of a 30 day working capital allowance for gas.
- AG-4-8 Refer to Exhibit 10, M.D.T.E. NO. 72, page 1 of 3. Please explain why the WC term of the GAF formula is not divided by annual sales.
- AG-4-9 Is the Company proposing to recover its gas related bad debt expense through base rates? If yes, please explain why?
- AG-4-10 Please redo the Company's fully allocated cost of service study that excludes all gas and related costs, including gas costs related to bad debts. Include all associated workpapers, calculations and supporting adjustments, along with a narrative explaining what specific adjustments were made to eliminate the gas costs related to bad debts. Provide as part of the response a diskette containing the cost of service worksheets and supporting calculations as Excel files with cell formulae in tact.
- AG-4-11 Refer to Exhibit 7, Rate Design Worksheet. Please explain how the low income discount amount was determined. Provide all workpapers, calculations and assumptions regarding the estimated number of customers and usage. If the Company has not contacted the local CAP agency to determine an estimate of the number of eligible customers, please do so and provide the agency's response. If the Company has obtained this information already, please provide it.
- AG-4-12 Please explain why the Company selected a 25% discount for its low income rate proposal. Include a schedule showing the effective distribution rate discounts for each of the other Massachusetts LDCs.
- AG-4-13 Please provide the billing determinants used in the Company's rate design. Include a detailed explanation of how these determinants were developed and all supporting workpapers, calculations and assumptions.
- AG-4-14 Please provide all the data supporting the twenty year average heating degree days used in the Company's weather normalization calculations. Include the source data for each month of the twenty years.
- AG-4-15 Please provide the test year actual monthly sales quantities and revenues for each of the Company's rate classes, the school and each special contract customer (including arrangements with interruptible, firm, quasi-firm, and off system customers). Include the rates charged by category (customer, base rate by block, CGA per unit, DSM per unit,

administrative charges, balancing charges and penalties, etc.). Include the details of any adjustments made to actual billed amounts. Indicate whether these amounts were billed under a tariff or a special contract. Please provide copies of all contracts with the school and all other special contracts.

- AG-4-16 Please provide for the 3 years prior to the test year monthly sales quantities and revenues for each of the Company's rate classes, the school and each special contract customer (including arrangements with interruptible, firm, quasi-firm, and off system customers). Include the rates charged by category (customer, base rate by block, CGA per unit, DSM per unit, administrative charges, balancing charges and penalties, etc.). Include the details of any adjustments made to actual billed amounts. Indicate whether these amounts were billed under a tariff or a special contract. Please provide copies of all contracts with the school and all other special contracts in effect during this period.
- AG-4-17 Please provide, for each of the Company's rate classes, the school and each special contract customer (including arrangements with interruptible, firm, quasi-firm, and off system customers), an estimate of the sales and revenues anticipated during 2002. Include all supporting workpapers, calculations and assumptions.
- AG-4-18 How does the Company account for these revenues and expenses related to the school and each special contract customer (including arrangements with interruptible, firm, quasi-firm, and off system customers)? Provide the account and sub-account numbers, and descriptions of these accounts.
- AG-4-19 Are there other schools in the Company's service territory that are currently being served under the Company's general service rate? If yes, is it the Company's intent to transfer these schools to the proposed school rate? If no, why?
- AG-4-20 Are there other schools in the Company's service territory that qualify for the proposed school rate? If yes, is it the Company's intent to market to these schools? If no, why?
- AG-4-21 Why did the Company propose a school tariff that is open to all schools and not a special transitional arrangement, either a tariff or special contract, that would apply only to the existing customer as a transition to a full cost based rate?

Dated: August 2, 2001.